

AMERICAN ARBITRATION ASSOCIATION

<p>STEPHEN F. EMERY, M.D., JAY WINZENRIED, M.D., BIG HORN BASIN BONE AND JOINT, LLC, JOHN) SCHNEIDER, M.D., SCHNEIDER LIMITED PARTNERSHIP, SCHNEIDER MANAGEMENT, LLC, ANDREW BAKER, and DANIEL MATTSON,</p> <p><i>Claimants,</i></p> <p>v.</p> <p>MERIDIAN SURGICAL PARTNERS MONTANA, LLC, and MERIDIAN SURGICAL PARTNERS, LLC,</p> <p><i>Respondents,</i></p> <p>v.</p> <p>MICHELLE SCHNEIDER,</p> <p><i>Counterclaim Respondent.</i></p>	<p>Case No. 65-20-1400-0026</p>
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Motion to compel attorney E. Steele Clayton to present himself as a witness in this arbitration and withdraw as counsel for Meridian Surgical Partners LLC and Meridian Surgical Partner's Montana.

John H. Schneider, MD as a self-representative agency in this arbitration

Respectfully request an order to compel attorney E. Steele Clayton to present himself as a witness in this arbitration regarding his interference with business development of the OMNI ASC partnership.

Historical Facts:

1. The law firm of Bass Berry Simms was hired by each of the physician partners and Meridian Surgical Partners MT as a single unified entity when creating the OMNI ASC ONI LLC investment opportunity. This law firm created the business and governance documents and as such was counsel of records for all parties investing as the OMNI ASC partnership.

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STEPHEN F. EMERY, M.D.,)	
JAY WINZENRIED, M.D., BIG HORN)	
BASIN BONE AND JOINT, LLC, JOHN) SCHNEIDER, M.D.,)	
SCHNEIDER)	
LIMITED PARTNERSHIP, SCHNEIDER) MANAGEMENT,)	
LLC, ANDREW BAKER,) and DANIEL MATTSON,)	
)	Case No. 65-20-1400-0026
<i>Claimants,</i>)	
)	
v.)	
)	
MERIDIAN SURGICAL PARTNERS -)	
MONTANA, LLC, and MERIDIAN)	
SURGICAL PARTNERS, LLC,)	
)	
<i>Respondents,</i>)	
)	
v.)	
)	
MICHELLE SCHNEIDER,)	
)	
<i>Counterclaim Respondent.</i>)	

OBJECTION TO
RESPONDENTS' MOTION TO COMPEL RESPONSES TO DEPOSITION QUESTIONS
FROM JOHN SCHNEIDER, M.D.

John H. Schneider, MD as a self-representative agency in this arbitration
objects to RESPONDENTS' MOTION TO COMPEL RESPONSES TO DEPOSITION
QUESTIONS FROM JOHN SCHNEIDER, M.D. This objection is made on the following grounds:

1. This objection seeks to quash Meridian counsel's continued efforts to cloud and distract this court's discovery process related to the fraud and negligence perpetrated by Meridian Healthcare employee's Kenneth Hancock, Buddy Bacon, Kathleen Kowalski, Giovanna Grissom, John Wilson and Chris Susa upon the physician and nurse anesthesia providers making up the partnership OMNI Surgical partners. Meridian Healthcare was at all times grossly negligent and failed to conduct business due diligence before misrepresenting in both verbal and written contract that they had competence and skill in developing an